

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

SHANNI SNYDER,)	
)	
Plaintiff,)	2:11-cv-00879-MRH
)	
v.)	
)	
MICHAEL DAUGHERTY, et al,)	
)	
Defendants.)	

OPPOSITION TO MOTION TO DIRECT PLAINTIFF TO MAKE WITNESSES AVAILABLE
(ENTRY 66)

Plaintiff Shanni Snyder ("Snyder") opposes the Motion to Direct Plaintiff to Make Witnesses Available:

1. First, the Defendants filed their motion without even contacting the Plaintiff.
2. Second, the Defendants include allegations from a third-party, a private detective, but include no affidavit or other evidence.
3. Third, the Plaintiff is not responsible for the Defendants' desire to serve a subpoena. Plaintiff cannot make the witnesses be home when the Defendants' want.
4. Defendants cite no rule that places the burden on the Plaintiff to gather and serve witnesses with subpoenas on their behalf.
5. Defendants maintain an obligation to act diligent in serving subpoenas. They cannot send a process server once or twice to a location and expect the witnesses to cooperate and be home.
6. Plaintiff can advise the Defendants that the gentlemen who answered the door at 98 Arlene Drive in North Versailles, PA 15137, is most likely her father, George Snyder Sr. Plaintiff does not have any control over her father. It is understood that the Defendants

are seeking to depose George Snyder Jr., Plaintiff's brother. Plaintiff can state that she is aware that George Jr. is estranged from George Sr. and that George Jr. does not reside at 98 Arlene Drive in North Versailles, Pennsylvania.

7. The proper method of obtaining a physical address of a person using a post-office box is to request the data from the United States Postal Service which releases the same when parties are in a litigation, not to place the burden on the Plaintiff.
8. Plaintiff believes that George Jr. does reside at the address that Defendants list; however, she does not visit him at that location, has no actual knowledge, and has no ability to force him to appear absent the Defendants complying with Rule 45.
9. The same goes for Kash Snyder. The Defendants need to serve their subpoena under Rule 45. Plaintiff does not maintain the ability to force him to appear without process and a paid witness fee.

WHEREFORE, Plaintiff respectfully requests that the motion be denied.

Respectfully submitted,

EXHIBIT COPY -- ORIGINAL WAS SIGNED

Shanni Snyder
PO Box 96
East McKeesport, PA 15035
(412) 758-1371 Telephone
(412) 774-2210 Facsimile

PLAINTIFF

CERTIFICATE OF SERVICE

I, Shanni Snyder, certify that I mailed a true copy of the foregoing to the following persons on this 11th day of March, 2013, by First Class Mail:

Clerk, United States District Court
PO Box 1805
Pittsburgh, PA 15230

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Goggin
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EXHIBIT -- ORIGINAL WAS SIGNED

Shanni Snyder